

# **EXHIBIT 95**

# **REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*The County of Cuyahoga v. Purdue  
Pharma L.P., et al.,*  
Case No. 17-op-45004

and

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P., et al.,*  
Case No. 18-op-45090.

MDL No. 2804

Case No. 1:17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF CANDACE HARBAUER**

Pursuant to 28 U.S.C. § 1746, I, Candace Harbauer, declare as follows:

1. I am Vice President of Administration, Human Resources Manager, and Designated Representative of Prescription Supply Inc. ("Prescription Supply"), located in Northwood, Ohio. I have personal knowledge of the facts set forth in this declaration and if called as a witness could testify competently thereto.
2. The Ohio Board of Health (the "Board") performed a physical inspection of Prescription Supply's distribution center in Northwood, Ohio on May 22, 2017. Agents from the Board met with company management and requested policies and procedures relating to reporting suspicious orders to the Board.
3. As requested, Prescription Supply submitted its written policies and procedures on suspicious-order reporting to the Board. The Board followed up on Prescription Supply's submission by requesting completion of a questionnaire, to which Prescription Supply provided a

Written Response on or about October 25, 2017. A true and correct copy of the Written Response is Bates-stamped PSI0000007–0000083.

4. Based on the on-sight inspection, management interviews, and records review, the Ohio Board of Pharmacy concluded, “[a]dequate systems are in place to detect and deter drug diversion” at Prescription Supply’s distribution center. A true and correct copy of the State of Ohio Board of Pharmacy Wholesaler – Category 3 Non-Pharmacy Inspection Report, dated June 6, 2018, is Bates-stamped PSI-099454–099460.

5. The Board of Pharmacy also determined that (1) controlled substances were adequately safeguarded; (2) satisfactory verification procedures were in place with respect to the purchase of controlled substances; (3) required records were being maintained for the required three-year period; (4) inventories of controlled substances were being adequately conducted and audited; and (5) an adequate system was “in place to identify and report suspicious orders” of controlled substances. PSI-099456; 099457; 099459

# Redacted

[DECLARATION CONTINUED ON NEXT PAGE]

Executed on this 29<sup>th</sup> day of July 2019 in Northwood, Ohio.



Candace Harbauer